

# Exhibit 47

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Thomas I. Vanaskie (Ret.),  
Magistrate Judge

**DECLARATION OF ZHANG PEI**

1. I am Supervisor of New Drug Strategic Planning Department for Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), with responsibility for new drug R&D project management and strategy planning.

2. I understand that the Court has requested that ZHP verify that the litigation hold notice attached as Exhibit A, and dated November 19, 2019, is the same as the notice sent on December 11, 2019, December 19, 2019, December 20, 2019, and December 21, 2019, to certain ZHP employees outlined on Exhibit B.

3. I have reviewed the notice attached as Exhibit A, and affirm that the contents of the notice attached as Exhibit A are the same as the contents of the notice sent in December 2019 to the ZHP employees listed on Exhibit B.

4. Further, in reviewing Exhibit B, there are four typographical errors that are corrected as follows:

- the notice sent to Gu, Ziqiang was sent on November 22, 2019 rather than November 20, 2019 as indicated in Exhibit B;
- the notice sent to Hu, Ping was sent on November 20, 2019 rather than December 19, 2019 as indicated in Exhibit B;
- the name Wang, Yuehua, is corrected to Wu, Yuehua; and
- the name Wang, Yuhua, is corrected to Wang, Yihua.

20. 1/12

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Executed on December 9, 2021 in Shanghai (city),        (province)

Zhang Pei (张佩)  
Zhang Pei, Declarant

## EXHIBIT B

## Litigation Notices Issued by ZHP Parties as of December 30, 2019

Name	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on March 6, 2019	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
An, Jianguo									X		
Arbab, Noor	X										
Arnold, Matthew	X		X								
Ayres, David	X		X		X						
Bao, Chaochua							X				
Bill, Jr., Jon M.					X						
Cai, Ping (Dan)						X					
Chen, Baozhen		X		X		X					
Chen, Boahua						X					
Chen, Q. M.		X		X					X		
Chen, Wei						X					
Chen, Wenbin		X		X		X					
Chen, Xiang							X				
Chen, Y. F.						X					
Chen, Yingzhi						X					
Chen, Yong									X		
Chen, Yuanyan						X					
Chen, Yuping						X					
Cheng, Jie									X		
Cheng, Wei						X					
Dong, Peng		X		X		X					
Du, Jun	X		X		X						
Fang, Yuling	X		X						X		
Farrell, Doug	X		X		X						
Gao, Xiaojun						X					
Ge, Jucai		X		X		X					
Gelineau, Hillary	X		X		X						
Gergis, Remonda	X		X		X						

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Groenewoud, Pieter					X						
Gu, Eric		X		X		X					
Gu, Ziqiang						X					
Guo, Xiaodi	X		X		X						
Han, Fang				X							X
Han, Yang							X				
He, Xin					X						
He, Y. Y.							X				
Hu, Min							X				
Hu, Ping									X		
Hu, Wenping						X					
Hu, Yuelin		X		X		X					
Hu, Zhicheng							X				
Huang, Luning									X		
Iozzia, John	X		X		X						
Jia, Zhengjun						X					
Jin, Yongjun						X					
Jin, Yun						X					
Jing, Jin						X					
Kaufman, Ron	X		X		X						
Keith, Chris	X		X		X						
Kong, Xiaofang (Maggie)	X		X		X						
Kuang, Xiaxia									X		
Kuo, Shenghung	X										
Li, Hongchao						X					
Li, J. Y.						X					
Li, Min		X		X		X					
Li, Na									X		



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Li, Qiangming		X		X		X					
Li, Qing							X				
Li, Xiaoling						X					
Li, Yaohan (Isabel)	X		X		X						
Liang, Zunjun		X		X			X				
Lin, Jie							X				
Lin, Linda	X	X	X	X		X					
Lin, Ling									X		
Lin, Mudan							X				
Liu, Nelson	X		X		X						
Liu, Taofang							X				
Liu, Tiyun							X				
Liu, X. G.						X					
Liu, Xiaoming		X		X		X					
Liu, Yanfeng (Lucy)						X					
Luo, Guangyu	X		X		X						
Meng, Yanhua (Anne)		X		X			X				
Min, Jin		X		X					X		
Min, Zeqi									X		
Pajoohi, Ken	X		X		X						
Ping, Huling		X		X					X		
Qiao, Gavin	X				X						
Qiu, Hongchun			X		X						
Qiu, Jane					X						
Shang, Fei				X		X					
Shang, Peng					X						
Sun, Dengxue							X				
Tan, Li							X				

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Tang, Fengyang							X				
Tang, Yiming	X		X		X						
Tao, Juan						X					
Tian, Yun							X				
Tong, Nan						X					
Tong, Zengyuan							X				
Tsai, Ph.D., Wen-Chien (Eric)	X		X		X						
Wang, Dongqin						X					
Wang, Hai	X		X		X						
Wang, Haiqin							X				
Wang, Hui									X		
Wang, Jian		X		X							
Wang, Jie (Legal)		X		X							X
Wang, Jie (Sales)						X					
Wang, Jun										X	
Wang, Lijie	X		X		X						
Wang, Lina							X				
Wang, Lingfang									X		
Wang, Ma	X		X						X		
Wang, Minfa	X		X		X						
Wang, Peng		X		X		X					
Wang, Youhu						X					
Wang, Yuehua							X				
Wang, Yuhua							X				
Wen, Ping							X				
Wu, Lina						X					
Wu, Tina	X				X						
Xi, Lily	X		X		X						



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Xiang, Jn		X		X					X		
Xianyi, Xu	X	X	X	X					X		
Xie, Chongjun						X					
Xie, Mengmeng							X				
Xie, Yuanyuan					X						
Xiong, Sophie			X								
Xiong, Ying		X				X					
Xu, Baoxia							X				
Xu, Mi						X					
Xu, Min									X		
Xu, Pijie		X		X		X					
Xu, Weiwei						X					
Yan, Fengfeng							X				
Yang, Chun							X				
Yang, Yang									X		
Ye, Cunxiao (Jenson)		X									
Ye, Jian							X				
Ye, Tree	X										
Ying, Chen	X		X		X						
Yu, Xiao							X				
Yu, Zhongshui	X		X		X						
Zeng, Guang							X				
Zhang, Danyang									X		
Zhang, Fuyu									X		
Zhang, Kathy	X		X		X						
Zhang, Mei		X		X					X		
Zhang, Minli		X		X		X					
Zhang, Pei			X								X

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Zhang, Renguo		X		X							X
Zhang, Shiwen		X		X							
Zhang, Tian						X					
Zhang, Wenling		X				X					
Zhang, Xianhua						X					
Zhang, Xianliang							X				
Zhao, Caifeng						X					
Zhao, David (Dachuan)	X		X								
Zhao, Jianzhi								X			
Zhao, Louis										X	
Zhao, Xiaohong				X		X					
Zhao, Yueding						X					
Zheng, Gaozhe						X					
Zheng, Meng								X			
Zheng, Youqing						X					
Zhong, Fengg (Vicky)						X					
Zhong, Sheng						X					
Zhou, Huoming							X				
Zhou, Qiang						X					
Zhou, Sandy	X		X		X						
Zhou, Ting (Ada)				X		X					
Zhou, Xiaohui							X				
Zhou, Yong		X		X		X					
Zhu, Jenny		X		X					X		
Zhu, Kaiwei									X		
Zhu, Lesley	X		X		X						
Zhu, Wenquan		X		X		X					
Zhu, Xiaoren						X					

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Zhu, Yan		X		X					X		
Zhu, Yonghua		X		X							X